

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

<p>Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury, on behalf of themselves and all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,</p> <p style="text-align: center;">Defendant.</p>	<p>No.: 2:15-cv-01045-RFB-BNW</p>
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**DECLARATION OF STEVEN WEISBROT, ESQ. OF ANGEION GROUP LLC
RE THE SETTLEMENT NOTICE PLAN**

I, Steven Weisbrot, Esq., declare under penalty of perjury as follows:

1. I am the President and Chief Executive Officer at the class action notice and claims administration firm Angeion Group, LLC (“Angeion”). Angeion specializes in designing, developing, analyzing, and implementing large-scale legal notification plans.
2. I have personal knowledge of the matters stated herein. In forming my opinions regarding notice in this action, I have communicated with class counsel and reviewed relevant pleadings and other documents relating to the case, in addition to drawing from my extensive class action notice experience.
3. Background information on my professional experience and Angeion’s expertise with the design and implementation of hundreds of court-approved notice and administration programs, including some of the largest and most complex notice plans in recent history, is set forth in my November 17, 2023 declaration submitted with Plaintiffs’ Unopposed Motion for Approval of Class Notice Plan in *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*, Case No.

2:15-cv-01045-RFB-BNW (the “Action”). *See* Declaration of Steven Weisbrot of Angeion Group, LLC re Angeion Qualifications and the Proposed Notice Plan, ¶¶ 3-16 & Exhibit D (ECF No. 916-1) (the “November 17, 2023 Weisbrot Decl.”).

4. This declaration sets for a plan of notice (the “Notice Plan”) for a settlement (the “Settlement”) resolving the Action. The Action was brought by plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury and named one defendant, Zuffa, LLC. On August 9, 2023, the Court certified the Class (*see* below) and appointed all the plaintiffs in the Action, other than Nathan Quarry, as the class representatives for the Class (the “Class Representatives”). *See* ECF No. 839, at 78-79.¹ The Class Representatives together with Mr. Quarry are collectively referred to as “Plaintiffs.”

5. On August 9, 2023, the Court certified the Class, which includes all persons who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017, but excludes from the Class all persons who are not residents or citizens of the United States unless the UFC paid such persons for competing in a bout fought in the United States. *See* ECF No. 839 (defining the Bout Class)). On November 17, 2023, the Court directed notice to the Class pursuant to the notice plan set forth in the November 17, 2023 Weisbrot Decl., ¶¶ 17-41. *See* ECF No. 921. The Court also appointed Angeion as the notice administrator for the Class. *See id.* ¶ 1.

6. On February 5, 2024, Plaintiffs in the Action filed with the Court a notice concerning the implementation of the Class notice program. *See* Plaintiffs’ Notice of: (1) Effectuation of Class Notice Plan, and (2) Exclusions from Bout Class, ECF No. 966, at 1 (Feb. 5, 2024). Attached to Plaintiffs’ Notice was a second declaration from Angeion describing in detail the notice process and indicating

¹ Plaintiff Nathan Quarry was proffered as a class representative for the “Identity Rights Class,” which the Court did not certify. *See generally* ECF No. 839 at 75-78.

that, as of February 5, 2024, no requests for exclusion were submitted by members of the Class (the deadline to request exclusion from the Class was January 22, 2024). *See generally* Declaration of Steven Weisbrot, Esq. of Angeion Group, LLC re Implementation of Notice Plan and Report on Exclusions and Objections Received, ECF No. 966-1 (Feb. 5, 2024).

7. As I understand it, on September 26, 2024, the parties finalized the written agreement setting forth the terms and conditions of the Settlement, which include the release and dismissal with prejudice of the Plaintiffs' claims against the Defendant (the "Settlement Agreement").

8. The proposed Notice Plan, as described below, is substantially similar to the plan for notice articulated in the November 17, 2023 Weisbrot Decl., and which the Court approved. ECF No. 921. Angeion will disseminate the notice and maintain the Settlement website (www.UFCFighterClassAction.com) in the same manner as described in the November 17, 2023 Weisbrot Decl., and outlined below, except the information provided to the Class will be amended to include information relating to the Settlement (including, but not limited to, information about the timing for the claim submission process, the proposed Plan of Allocation, the deadlines for submitting objections, and the date of the Fairness Hearing, among other information) as reflected in the updated proposed long-form notice, short-form notice, and poster notice with cover letter attached hereto as Exs. A, B & C, respectively. As noted above, the deadline for members of the Class to request exclusion from the Class has already passed. Should the Court require an additional opt-out period, that fact would be reflected in the forms of notice to be used as part of the Notice Plan.

SUMMARY OF THE NOTICE PLAN

9. The proposed Notice Plan provides for individual direct notice via email and/or U.S. mail to all reasonably-identifiable members of the Class, complemented by a targeted first-party social media campaign, and posted notice in notable Mixed Martial Arts ("MMA") Gyms. The Notice Plan also includes updating and maintaining the Settlement Website and toll-free telephone line where members

of the Class can learn more about their rights and options in the Settlement.

EMAIL NOTICE

10. As part of the Notice Plan, Angeion will send direct email notice (in the short-form notice format) to all members of the Class who have valid email addresses on the Class List (*i.e.*, the list of Class Member contact information Angeion generated in connection with the prior notice program). Angeion follows best practices to both validate emails and increase deliverability.

11. Specifically, prior to distributing the email notice, Angeion subjects the email addresses to a cleansing and validation process. The email cleansing process removes extra spaces, fixes common typographical errors in domain names, and corrects insufficient domain suffixes (*e.g.*, gmail.com to gmail.com, gmail.co to gmail.com, yaho.com to yahoo.com, etc.). The email addresses are then subjected to an email validation process whereby each email address will be compared to known bad email addresses.² Email addresses that are not designated as a known bad address will then be further verified by contacting the Internet Service Provider (“ISP”) to determine if the email address exists.

12. Further, Angeion designs the email notice to avoid many common “red flags” that might otherwise cause an email recipient’s spam filter to block or identify the email notice as spam. For example, Angeion does not include attachments like the long-form notice to the email notice because attachments are often interpreted by various ISPs as spam.

13. Angeion also accounts for the reality that some emails will inevitably fail to be delivered during the initial delivery attempt. Therefore, after the initial noticing campaign is complete, Angeion, after an approximate 24- to 72-hour rest period (which allows any temporary block at the ISP level to expire) causes a second round of email noticing to continue to any email addresses that were previously

² Angeion maintains a database of email addresses that were returned as permanently undeliverable, commonly referred to as a hard bounce, from prior campaigns. Where an address has been returned as a hard bounce within the last year, that email is designated as a known bad email address.

identified as soft bounces and not delivered. In our experience, this minimizes emails that may have erroneously failed to deliver due to sensitive servers and optimizes delivery.

14. In addition to the comprehensive methods described above, Angeion will cause any email address for which email notice could not be delivered to be subjected to an email change of address search in an attempt to locate updated email addresses. Angeion will then send email notice to any updated email addresses obtained via this process.

15. At the completion of the email campaign, Angeion will report to the Court concerning the rate of delivered emails accounting for any emails that are blocked at the ISP level. In short, the Court will possess a detailed, verified account of the success rate of the entire direct email notice campaign.

POSTAL MAILED NOTICE

16. Angeion will mail the long-form notice via first class U.S. Mail, postage pre-paid, to all members of the Class who do not have valid email addresses and for whom mailing addresses are included on the Class List.

17. Angeion will employ the following best practices to increase the deliverability rate of the mailed notices: (i) Angeion will cause the mailing address information to be updated utilizing the United States Postal Service's ("USPS") National Change of Address database, which provides updated address information for individuals or entities who have moved during the previous four years and filed a change of address with the USPS; (ii) Notices returned to Angeion by the USPS with a forwarding address will be re-mailed to the new address provided by the USPS; (iii) Notices returned to Angeion by the USPS without forwarding addresses will be subjected to an address verification search (commonly referred to as "skip tracing") utilizing a wide variety of data sources, including public records, real estate records, electronic directory assistance listings, etc., to locate updated addresses; (iv) Notices will be re-mailed to updated addresses that were identified via the skip tracing process.

MEDIA NOTICE

18. As part of our belt and suspenders approach, in addition to the direct notice efforts described above (by both email and U.S. mail), the Notice Plan includes a comprehensive media notice campaign comprised of targeted social media notice via Facebook, Instagram and X (formerly “Twitter”), and a paid search campaign via Google.

Targeted Social Media Notice

19. The direct, targeted social media notice will be implemented by uploading known Class Member email addresses directly to Facebook, Instagram and Twitter, three of the largest social media platforms in the United States.³ If any of the email addresses are used as the primary log-on email address for these platforms, Angeion will be able to contact those specific members of the Class on a one-to-one basis via internet ads displayed on these platforms. The internet ads will direct the members of the Class to the Settlement website, where members of the Class can view the long- and short-form notices and other important documents from the case and find answers to frequently asked questions as well as contact information.

20. Further, for members of the Class who do not have email addresses on the Class List, Angeion will perform research to identify their verified social media accounts on those platforms. Social media notice will then also target those verified accounts.

Paid Search Campaign

21. The Notice Plan also includes a paid search campaign on Google to help drive members of the Class who are actively searching for information about the settlement to the dedicated Settlement

³ In the United States in 2023, Facebook has a reported 243.58 million users, Instagram has a reported 150.99 million users, and X/Twitter has a reported 64.9 million users. *See*: <https://www.statista.com/statistics/408971/number-of-us-facebook-users>
<https://www.statista.com/statistics/293771/number-of-us-instagram-users>
<https://www.oberlo.com/statistics/number-of-twitter-users-by-country>

website. Paid search ads will complement the social media notice, as search engines are frequently used to locate a specific website, rather than a person typing in the URL. Search terms would relate to not only the Settlement itself but also the subject matter of the class action. In other words, the paid search ads are driven by the individual user's search activity, such that if that individual searches for (or has recently searched for) the litigation or other terms related to the class action, that individual could be served with an advertisement directing them to the Settlement website.

MMA GYM NOTICE

22. In coordination with class counsel, Angeion will identify notable and relevant MMA Gyms (including training camps). A poster-size version of the short-form notice (11" x 17") will be sent to each of the notable MMA Gyms that are researched and identified, along with a request to post the notice in a highly visible area where members of the Class are most likely to view the notice. *See* Ex. C hereto.

SETTLEMENT WEBSITE & TELEPHONE SUPPORT

23. The Notice Plan includes updating and maintaining the Settlement website, www.UFCFighterClassAction.com, where members of the Class can easily view general information about this settlement and review relevant Court documents. The Settlement website was designed to be user-friendly to make it easy for members of the Class to find information about the settlement, view dates and deadlines, and will have a "Contact Us" page containing a dedicated email address by which members of the Class can send additional questions regarding the settlement.

24. The Settlement website will be designed to be ADA-compliant and optimized for mobile visitors so that information loads quickly on mobile devices. Additionally, the dedicated website will be designed to maximize search engine optimization through Google and other search engines. Keywords and natural language search terms will be included in the website's metadata to maximize search engine rankings.

25. The toll-free hotline devoted to this case will be updated to apprise members of the Class of their rights and options in the settlement. The toll-free hotline will continue to utilize an interactive voice response (“IVR”) system to provide members of the Class with responses to frequently asked questions and other essential information regarding the Settlement. The hotline will remain accessible 24 hours a day, 7 days a week. Members of the Class will have the ability to request a copy of the notice via the toll-free hotline.

CONCLUSION

26. The Notice Plan outlined above includes direct notice to all reasonably identifiable members of the Class via email and/or mail, complemented by a comprehensive media and outreach campaign. The Notice Plan also provides for the implementation of a dedicated website and toll-free hotline to further inform members of the Class of their rights and options in the Settlement.

27. It is my professional opinion that this Notice Plan will provide full and proper notice to the members of the Class before the claims and objection deadlines. Moreover, it is my opinion that the Notice Plan is the best notice that is practicable under the circumstances and fully comports with due process and Fed. R. Civ. P. 23. After the Notice Plan has been implemented, Angeion will provide a final report verifying its effective implementation to this Court.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: October 7, 2024


STEVEN WEISBROT

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

NOTICE OF CLASS ACTION SETTLEMENT

A settlement totaling \$375 million that will provide payments to mixed martial arts (“MMA”) fighters if they competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017.

Please read this notice carefully to learn whether this class action settlement may affect your rights.

A federal court directed this notice.

This is not junk mail, an advertisement, or a solicitation from a lawyer.

- On [DATE], the Honorable Richard F. Boulware, II of the United States District Court for the District of Nevada (the “Court”), entered an order preliminarily approving a proposed settlement (the “Settlement”) between the parties in a class action captioned *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*, Case No. 2:15-cv-01045 (the “Action”).
- The Settlement is for the benefit of MMA fighters who are members of the Class that the Court certified on August 9, 2023. The Class includes all persons (referred to as “Class Members”) who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017 (the “Class Period”). The Class excludes all persons who are not residents or citizens of the United States unless the UFC paid such persons for competing in a bout fought in the United States. Pursuant to a Court Order dated November 17, 2023, notice was sent to members of the Class regarding the pendency of the Action. That notice provided Class members the right to exclude themselves from the Class. The deadline to request exclusion from the Class has already passed.
- The Court has appointed the following five professional UFC fighters to serve as representatives of the Class: Cung Le, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury (the “Class Representatives”). The defendant in the Action is Zuffa, LLC (the “Defendant” or “UFC”).
- The Action alleges that the UFC used anticompetitive conduct to establish and maintain its dominance in the market for Elite Professional MMA services. The alleged conduct

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included, among other things: (a) entering exclusive contracts with UFC fighters that effectively blocked the vast majority from fighting for rival MMA promotions; (b) acquiring rival promotion companies and locking up their MMA fighters into exclusive contracts; and (c) coercing fighters into long-term exclusivity with the UFC (together, the “Scheme”). The Action further alleges that the Scheme enabled the UFC to injure members of the Class by artificially suppressing their bout pay.

- Defendant denies Plaintiffs’ allegations and any wrongdoing. Defendant asserts that through its efforts to grow MMA and the UFC, Defendant has consistently increased the number of events that the UFC promotes and the compensation paid to fighters who participate in its MMA bouts. Defendant contends that Plaintiffs’ claims lack merit and that UFC’s conduct was *pro*-competitive, *not* anticompetitive: (a) UFC’s acquisitions of other MMA promotion companies helped grow the MMA industry by efficiently allocating resources and did not result in the improper foreclosure of competitors, as evidenced by new market entrants and the continued growth of rival MMA promotion companies; (b) UFC’s exclusive contracts with UFC fighters did not foreclose a substantial share of the market for MMA fighter services and were, in fact, pro-competitive because they were supported by legitimate business justifications; and (c) UFC did not “coerce” fighters to sign long-term exclusive contracts with the UFC, but rather hired the best fighters—who want to fight in the UFC—to help its business grow and re-signed those fighters to contracts of greater or equal value to those offered by other MMA promotions, none of which is anticompetitive according to Defendant.
- The Court has not decided which side is correct.
- If the Court approves the Settlement, the Settlement will provide cash payments to members of the Class who submit valid and timely Claim Forms later in the process. A Claim Form is a document the Claims Administrator will make available to Class Members that contains the information needed to determine what distribution amount each Class Member will receive as part of the proposed Plan of Allocation. The Plan of Allocation, if approved by the Court, describes how the funds from the Settlement will be distributed to Class Members. Later in the process, each Class Member will need to fill out a Claim Form and return it to the Claims Administrator in order to receive any financial benefits from the Settlement. (This is also referred to as submitting a “claim.”) If you do not receive a Claim Form later in the process and believe you should have, you may contact the Claims Administrator. The timing of the mailing of any Claim Forms, and other information about the Settlement and how to participate in it, will be disclosed on the Settlement website: www.UFCFighterClassAction.com.
- Under the Plan of Allocation, the amount of money each Class Member who files a Claim Form receives will vary depending on several factors. As a general guideline, it is anticipated that using the procedures set forth in the Plan of Allocation, each Class Member, who submits a valid and timely Claim Form, may receive between 40% and 80% of the total amount he or she earned from the UFC for participating in UFC bouts during

the Class Period. This is only an estimate and not a guarantee on the amount any Class Member may receive.

- The Plan of Allocation, in summary, works as follows. As an initial step, the Defendant would pay \$375 million into the *Le v. Zuffa* Settlement Fund. After that, Court approved fees and costs would be deducted to produce the “Net *Le v. Zuffa* Settlement Fund,” which would earn interest. The Net *Le v. Zuffa* Settlement Fund will be allocated to Class Members who submit valid and timely claims (“Claimants”). Each Claimant will receive a distribution payment from the Net *Le v. Zuffa* Settlement Fund that is based on two *pro rata* factors: (i) the total compensation each Claimant earned for participating in UFC bouts fought during the Class Period; and (ii) the total number of UFC bouts each Claimant fought during the Class Period. All Claimants will have a minimum distribution payment of \$15,000.

This notice explains your legal rights and options—and the deadlines to exercise them.

- **Please read this notice carefully. Your legal rights will be affected whether you act or do not act. Please note that if you are a member of the Class, you have already been afforded the opportunity to exclude yourself and you cannot now exclude yourself from the Class.**
- **This is not a lawsuit against you.**
- **This notice has important information. It explains the Settlement and the rights and options of Class Members.**
- **For the full terms of the Settlement, you should look at the Settlement Agreement available at [INSERT WEB ADDRESS TO THE DOCUMENT ON THE WEBSITE].**
- **For additional information, including any updates relating to the Settlement or the Settlement approval process, visit www.UFCFighterClassAction.com or call toll-free 1-866-955-5564. You may also write to the Class Action Administrator by mail: UFC Fighter Class Action, c/o Class Action Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103, or email: info@UFCFighterClassAction.com.**

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE
TO INQUIRE ABOUT THIS NOTICE.**

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS

This chart provides summary information about your legal rights and options. The remainder of this notice is designed to provide more information to help you evaluate your options and answer any questions that you may have. You may:

DO NOTHING NOW, FILE A CLAIM LATER	<p>Remain a member of the Class. You have the right to continue participating in the Action as a Class Member. <i>You do not need to take additional action to remain in the Class or be a part of the Action against the Defendant.</i></p> <p><i>You need do nothing now.</i> However, <u>at a later time</u>, if the Settlement is approved, in order to receive money from the Action, you will need to file a Claim Form. <i>See</i> Question 11 for more information.</p> <p>As a Class Member, you will be bound by the outcome of the Action, and you are precluded from filing your own lawsuit covering the same or similar claims as in the Action.</p>
OBJECT TO THE SETTLEMENT	<p>If you do not agree with any part of the Settlement, or the Plan of Allocation, or you do not agree with the requested award of attorneys' fees, expenses, and/or service awards for the Class Representatives you may:</p> <ul style="list-style-type: none"> ● Write to the Court to explain why (<i>see</i> Question 17 for more information on filing an objection), and ● Ask to speak at the Court hearing about either the fairness of the Settlement, or the Plan of Allocation, or about the requested attorneys' fees, expenses, or service awards to the Class Representatives. <i>See</i> Questions 17, 18, 20.
FILE A CLAIM	<p>This is the only way to get money from the Settlement. You must file a timely and valid claim <i>at a later point in the process.</i> <i>See</i> Question 11 for more information.</p>
DEADLINES	<p><i>See</i> Questions 11, 17, 18 and 20 for more information about rights and options and all deadlines.</p>

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BASIC INFORMATION

1. Why did I receive this notice?

You have received this notice because records show you may have competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017 (the “Class Period”).

This notice explains the proposed Settlement between the parties in the class action *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*, Case No. 2:15-cv-01045 (D. Nev.) (the “Action”).

This notice explains the Action, the proposed Settlement, your legal rights, the benefits available, eligibility for those benefits, and how to get them. The Honorable Richard F. Boulware, II of the United States District Court for the District of Nevada is overseeing the Action.

On August 9, 2023, the Court certified the Class in this Action. You are receiving this notice because you may be a member of the Class. For more information about the Class, see Question 5.

The persons who started the Action are called the “Plaintiffs.” The Plaintiffs in the Action are Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury. All of the Plaintiffs in the Action, other than Nathan Quarry, are the “Class Representatives.”

The company that the Plaintiffs sued and settled with in the Action is the “Defendant.” The Defendant in the Action is Zuffa, LLC. As a shorthand reference, the Defendant may also be referred to as “UFC.”

2. What is this lawsuit about?

The lawsuit alleges that Defendant used an anticompetitive Scheme to establish and maintain UFC’s market dominance, which allegedly allowed the UFC to pay its fighters substantially less than it would have paid in a more competitive market during the Class Period in violation of federal antitrust law. The Defendant denies these claims and any allegation of wrongdoing, and assert several defenses, including that there is ample competition in the market for MMA fighters, that their conduct was pro-competitive, and that UFC continually and substantially increased fighter pay over the Class Period. The Honorable Richard F. Boulware, II of the United States District Court for the District of Nevada is overseeing the Action. The Court has not decided which side is correct.

To obtain more information about the claims in the Action you can view the complaints and other important court documents in this case at www.UFCFighterClassAction.com.

3. Why is this a class action, and who is involved?

In a class action lawsuit, one or more people called “Plaintiffs” or “Class Representatives” sue on behalf of other people who have similar claims. The people with similar claims together are a “class” and each member is called a “class member.” In a class action, the court resolves the issues for all class members, except for those who exclude themselves (or “opt-out”) of the class. The members of the Class already received notice about the Action after the Court certified the Class on August 9, 2023. The deadline for members of the Class to opt-out has already passed.

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4. Why is there a Settlement?

Plaintiffs and their lawyers (Plaintiffs' lawyers are referred to herein as "Class Counsel" and are defined in more detail in Question 14) believe that Class Members have been damaged by Defendant's conduct, as described in the Action (including the complaint and any amendments). Defendant believes that Plaintiffs' claims lack merit and would have been rejected at trial or on appeal. The Court has not decided which side was right or wrong or if any laws were violated. Instead, Plaintiffs and Defendant agreed to settle the case and avoid the delays, costs, and the risk of trial, and the appeals that would follow any such trial.

Plaintiffs and Class Counsel believe the Settlement is best for all members of Class.

The Settlement is the product of extensive arm's length negotiations between experienced lawyers, including mediation before an experienced mediator, the Honorable Layn Phillips. Settling the Action allows Class Members to receive significant cash payments (*see* Question 11 below).

The parties agreed to settle this case only after nearly ten years of litigation in the Action, including extensive fact and expert discovery in the Action, and trial preparation in the Action. During discovery in the Action, Class Counsel reviewed and analyzed more than 3 million of pages of documents and conducted 28 fact witness depositions (plus seven days of testimony from Defendant's Rule 30(b)(6) designees). The parties in the Action also completed expert discovery, which included the exchange of multiple expert reports and the depositions of all experts. The Court also held a seven-day, seven-witness hearing on the Plaintiffs' motion for class certification. And, finally, the parties in the Action prepared the case for trial, which was set to commence only a few months after the parties reached the agreement to settle the Action.

The Settlement allows Class Members who submit valid and timely Claim Forms (at a later time in the process) to receive material compensation, rather than risk ultimately receiving nothing and/or significant delay.

If the Settlement is approved, Plaintiffs and the members of the Class will dismiss and release their claims against Defendant and against all Releasees (as defined in the Settlement Agreement).

5. Am I a Class Member who is part of the class action lawsuit against the Defendant?

A member of the Class may participate in the Settlement. You are a member of the Class if you meet the following definition:

All persons who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017. The Class excludes all persons who are not residents or citizens of the United States unless the UFC paid such persons for competing in a bout fought in the United States.

(The Class is also referred to as the "Bout Class" in various papers and orders filed with the Court.)

Questions? Call 1-866-955-5564 Toll-Free or Visit www.UFCFighterClassAction.com

If you are not sure whether you are a Class Member, contact the Claims Administrator at:

- **The following toll-free number: 1-866-955-5564.**
- **Visit the Settlement website at www.UFCFighterClassAction.com.**
- **Write to the following address by mail: UFC Fighter Class Action, c/o Class Action Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.**
- **Use the following email address: info@UFCFighterClassAction.com.**

6. Are there exceptions to being a Class Member?

Yes. Excluded from the Class are all persons who are not residents or citizens of the United States, unless the UFC paid such persons for competing in a bout fought in the United States during the Class Period.

7. What are my rights as a Class Member?

You have the right to continue participating in the Action as a Class Member. You do not need to do anything at this time to remain in the Class or be a part of the Action against the Defendant.

As a Class Member, you will retain the possibility of receiving money from the Settlement if the Court approves the Settlement and you will be bound by the terms of the Settlement, including the release of claims. Because members of the Class already received notice about the Action after the Court certified the Class on August 9, 2023, and because the deadline for members of the Class to opt-out has already passed, you cannot request to be excluded from the Class. As a Class Member, you gave up your right to file your own separate lawsuit with regard to any of the claims released by the Settlement.

SETTLEMENT BENEFITS

8. What does the Settlement provide?

The Defendant has agreed to pay \$375 million in cash to be paid in three installments consisting of \$125 million after the Court preliminarily approves the Settlement, \$125 million after the Court grants final approval of the Settlement, and \$125 million no later than June 30, 2025.

Every Class Member who files a valid and timely claim during a process that will occur later will be paid from the monies Defendant paid to settle the Actions (the “*Le v. Zuffa* Settlement Fund”), less any fees, expenses or other deductions approved by the Court, plus any accrued interest (the “Net *Le v. Zuffa* Settlement Fund”). More specifically, money in the *Le v. Zuffa* Settlement Fund will be used to pay:

- The cost of Settlement claims administration and notice, and applicable taxes on the *Le v. Zuffa* Settlement Fund, and any other related tax expenses, as approved by the Court,
- Money awards for the Class Representatives for their service on behalf of the Class, as approved by the Court,

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- Money for Nathan Quarry to settle his individual Identity Rights Claim, and
- Attorneys' fees and reimbursement of expenses for Class Counsel, as approved by the Court (*see* Question 16 below for more information relating to attorneys' fees and other costs).

The money in the *Le v. Zuffa* Settlement Fund less the four categories of costs described just above is referred to as the "Net *Le v. Zuffa* Settlement Fund." The Net *Le v. Zuffa* Settlement Fund will only be distributed to members of the Class if the Court finally approves the Settlement and the plan for allocating the monies in the Net *Le v. Zuffa* Settlement Fund to members of the Class who submit valid and timely claims later in the process (referred to as the "Plan of Allocation").

9. How do I ask for money from the Settlement?

If you are a Class Member, you must submit a valid and timely claim to get money from the Net *Le v. Zuffa* Settlement Fund **during a process that will begin several months from now.** If the Court finally approves the Settlement, as part of the Court approved distribution and allocation process, the Claims Administrator will distribute a Claim Form to complete to all Class Members for which there are valid email or postal addresses. Class Members may also contact the Claims Administrator or visit the Settlement website if they do not receive a Claim Form. The Claim Form will include the deadline for timely submission and instructions on how to submit the Claim Form. Those Class Members who submit Claim Forms later in the process are called Claimants. The Court will decide whether to approve the plan of allocating the Net *Le v. Zuffa* Settlement Fund amongst the Claimants, and will set the schedule for that allocation process, at the time that it decides whether or not to approve the Settlement.

10. How much money will I get?

At this time, it is not known precisely how much each Class Member will receive from the Net *Le v. Zuffa* Settlement Fund or when payments will be made. The amount of your payment, if any, will be determined by the Plan of Allocation proposed by Plaintiffs and to be approved by the Court.

Under the Plan of Allocation, the amount of money distributed to each Class Member who files a valid and timely claim will vary depending on several factors. As a general guideline, it is anticipated that using the procedures set forth in the Plan of Allocation, each Class Member who submits a valid and timely claim may receive 40% and 80% of the total amount he or she earned from the UFC for participating in UFC bouts during the Class Period. This is only an estimate and not a guarantee on the amount any Class Member may receive.

The proposed Plan of Allocation can be summarized as follows. Each Claimant will be allocated his or her share of the Net *Le v. Zuffa* Settlement Fund based upon two *pro rata* factors: (i) the total compensation each received from the UFC for participating in UFC bouts (*i.e.*, the fighter's Event Compensation) during the Class Period; and (ii) the total number of UFC bouts each fought during the Class Period. All Claimants will receive a minimum recovery amount of \$15,000.

The Claims Administrator will make decisions regarding submissions of Claim Forms, including regarding their validity and amounts, with input from Class Counsel and Class Counsel's consulting economic expert.

The complete proposed Plan of Allocation is available on the Settlement website, www.UFCFighterClassAction.com.

HOW TO FILE A CLAIM

11. How do I file a claim?

If the Court approves the Settlement (*see* "The Court's Fairness Hearing" below at Question 18), the Court will at that time approve a Claim Form and set a deadline for Class Members to submit claims. At that time, to receive a payment, you must submit a Claim Form. The Claim Form for Class Members will be posted on the Settlement website and available by calling the toll-free number **1-866-955-5564**. Class Members will be able to submit claims electronically using the Settlement website or by email or through first class mail. A Claim Form will also be mailed to Class Members for which the Claims Administrator has valid and current addresses.

12. Who decides the value of my claim?

After receiving your timely-submitted Claim Form, the Court-appointed Claims Administrator will make decisions about the value and validity of claims with input from Class Counsel and Class Counsel's consulting economic expert.

The amount of each such Claimant's distribution payment will be determined using data and information provided by Defendant, including the total amount of the UFC Event Compensation paid to, and UFC bouts fought by, Class Members during the Class Period. The procedure used to determine the distribution amount to be paid to each Claimant is discussed in detail at Question 10 above.

Some companies may offer to help you file your Claim Form in exchange for a portion of your recovery from the Settlement. Sometimes these companies make it seem like you must use them to file a Claim Form. While you may choose to use such companies, you should know that such companies can be expensive, and that *you do not need to use such companies to file a claim in this case*. You can file with the Claims Administrator on your own, free of charge. Additionally, you are entitled to contact the Claims Administrator or Class Counsel for assistance with understanding and filing your Claim Form at no cost to you.

13. Am I giving up anything by filing a claim or not filing a claim?

As a Class Member, you cannot sue, continue to sue, or be part of any other lawsuit seeking recovery for the Released Claims against the Defendant or Releasees (defined below), even if you do not file a Claim Form. More specifically, your status as a Class Member means you have agreed to be bound by the Settlement Agreement and its terms including the release of claims contained therein.

The terms “Released Claims,” “Releasors,” and “Releasees” are defined in the Settlement Agreement, and they are discussed generally below to provide some background information on the Release in the Settlement Agreement. You should review the Settlement Agreement, which is available on the Settlement website, www.UFCFighterClassAction.com, for more detail about the Release. The claims released in the Settlement are described below.

The Settlement Agreement provides that the Releasors (including, without limitation, all members of the Class and their representatives) shall be deemed to have fully, finally, and forever released, relinquished, and discharged all “Released Claims” against the Releasees. These Released Claims include all known and unknown claims, causes of action, cross-claims, counter-claims, charges, liabilities, demands, judgments, suits, obligations, debts, setoffs, rights or recovery, or liabilities for any obligations of any kind whatsoever (however denominated), whether class or individual, in law or equity or arising under constitution, statute, regulation, ordinance, contract, or otherwise in nature—including without limitation any and all actual or potential actions, losses, judgments, fines, debts, liabilities (including joint and several), liens, causes of action, demands, rights, damages, penalties, punitive damages, costs, expenses (including attorneys’ fees and legal expenses), indemnification claims, contribution claims, obligations, compensation, and claims for damages or for equitable or injunctive relief of any nature (including but not limited to antitrust, RICO, contract, tort, conspiracy, unfair competition, or unfair trade practice claims)—known or unknown, suspected or unsuspected, asserted or unasserted, direct or derivative, based upon, arising from, or relating to: (i) the factual predicates of the Action, or any complaint or pleading therein, from the beginning of time until final approval of this Settlement Agreement, including any contracts, mergers, acquisitions, transactions, or any business practices of any kind employed or executed by Defendant or its affiliates or assigns; or (ii) any issue raised in the Action by pleading or motion.

Notwithstanding the above, Released Claims shall not include: (a) claims arising in the ordinary course of business, such as, and without limitation, contract disputes or negligence claims, (b) claims that any Class Member or Releasor has or may have that are being pursued by virtue of any Class Member or Releasor’s inclusion as part of the related action *Johnson, et al. v. Zuffa, LLC, et al.*, No. 2:21-cv-1189 (D. Nev.), separate and apart from any extinguished claims for prospective relief that are no longer being pursued and cannot be achieved in this Action, *see* ECF No. 947, or (c) claims to enforce this Settlement Agreement.

All Releasors also covenant not to sue any Releasee with respect to any of the Released Claims, and agree that all Releasors shall be permanently barred and enjoined from commencing, maintaining, or prosecuting, any action, suit, proceeding, or claim in any court, tribunal, administrative agency, regulatory body, arbitrator, or other body in any jurisdiction against any

Questions? Call 1-866-955-5564 Toll-Free or Visit www.UFCFighterClassAction.com

Releasee based in whole or in part upon, arising out of, or in any way connected or related to any Released Claim.

In addition, each Releasor hereby expressly waives and releases, upon the final approval of the Settlement, any and all provisions, rights, and benefits conferred by Section 1542 of the California Civil Code (or by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to §1545 of the California Code), which reads:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist at the time of executing the release, and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

The Scope and Effect of the Release: Upon the Court's Order finally approving the Settlement (and the resolution of any potential appeals), the Releasors hereby release and forever discharge, and covenant not to sue the Releasees only, with respect to, in connection with, or relating to any and all of the Released Claims.

THE LAWYERS REPRESENTING THE CLASS

14. Who represents the Class in this case?

The Court appointed the following law firms as Co-Lead Class Counsel (also referred to as "Plaintiffs' Counsel") to represent the Class:

Eric L. Cramer
Michael Dell'Angelo
BERGER MONTAGUE PC
1818 Market St., Suite 3600
Philadelphia, PA 19103

Benjamin Brown
Richard Koffman
COHEN MILSTEIN SELLERS & TOLL, PLLC
1100 New York Ave., N.W.
Suite 500, East Tower
Washington, D.C. 20005

Joseph Saveri
JOSEPH SAVERI LAW FIRM, LLP
601 California St., Suite 1505
San Francisco, CA 94108

The term "Class Counsel" refers to Co-Lead Class Counsel and the additional firms assisting them with litigating the Action. Class Counsel has been prosecuting the Action, *i.e.*, performing and overseeing work (including assistance from additional law firms who are identified in the Settlement Agreement) to advance the litigation on behalf of the Plaintiffs and the Class since December 2014 when the first case was filed.

15. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel are working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your lawyer to appear in Court for

Questions? Call 1-866-955-5564 Toll-Free or Visit www.UFCFighterClassAction.com

you if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

16. How will the lawyers be paid?

To date, Class Counsel have not been paid any attorneys' fees or reimbursed for any out-of-pocket costs or expenses that Class Counsel expended to litigate this case. Any attorneys' fees and costs and expenses will be awarded only as approved by the Court in amounts determined to be fair and reasonable. By [DATE], Class Counsel will move for an award of attorneys' fees, plus any accrued interest, reimbursement of reasonable litigation costs and expenses not to exceed \$12 million, and service awards of up to \$250,000 for each of the five Class Representatives (for a total of \$1,250,000) to be paid out of the *Le v. Zuffa* Settlement Fund. As to attorneys' fees, Class Counsel will request (a) up to one third of \$301.5 million, and (b) up to one fifth of \$73.5 million of the *Le v. Zuffa* Settlement Fund (plus any accrued interest). If the Court grants Class Counsel's requests, these amounts would be deducted from the *Le v. Zuffa* Settlement Fund. You will not have to pay these fees, expenses, or costs out of your own pocket.

Any motions in support of the above requests will be available on the Settlement website after they are filed on [DATE]. After that time, if you wish to review the motion papers, you may do so by viewing them at www.UFCFighterClassAction.com.

The Court will consider the motion for attorneys' fees and litigation costs and expenses, service awards at or after the Fairness Hearing.

OBJECTING TO THE SETTLEMENT

17. How do I tell the Court if I don't like any aspect of the Settlement?

If you are a Class Member, you can object to any part or any one of the Settlement, the Plan of Allocation, the request for attorneys' fees and litigation costs and expenses, and/or the service awards request for the Class Representatives.

To object, you must timely submit a letter (referred to as the "Statement of Objections") that includes the following: (1) the name of the Action (*Le, et al. v. Zuffa, LLC*, Case No. 2:15-cv-01045); (2) your name and address and if represented by counsel, the name, address, and telephone number of your counsel; (3) proof that you are a member of the Class; (4) a statement detailing your objections to the Settlement with specificity and including your legal and factual bases for each objection; and (5) a statement of whether you intend to appear at the Fairness Hearing, either with or without counsel, and if with counsel, the name of your counsel who will attend. Furthermore, all objections must be signed by the objecting member of the Class.

You cannot make an objection by telephone or email. You must do so in writing and file your objection with the Clerk of Court and mail your objection to the following address to be received by [DATE]:

United States District Court for the District of Nevada
Clerk of the Court
333 Las Vegas Blvd South

Questions? Call 1-866-955-5564 Toll-Free or Visit www.UFCFighterClassAction.com

Las Vegas, NV 89101

You must also send a copy of your Statement of Objections to the Claims Administrator at the following address:

Claims Administrator
UFC Fighter Class Action
Attn: Objections
PO Box 58220
Philadelphia, PA 19102

If you don't timely and validly submit your objection, your view will not be considered by the Court or any court on appeal.

THE COURT'S FAIRNESS HEARING

18. When and where will the Court decide to approve the Settlement, including the attorneys' fees and costs motion and the Plan of Allocation?

There will be a Fairness Hearing at [TIME] on [DATE]. The hearing will take place at the United States District Court for the District of Nevada, Courtroom 7C, 333 Las Vegas Boulevard South, Las Vegas, NV 89101.

Important! The time and date of the Fairness Hearing may change without additional mailed or published notice. For updated information on the hearing, visit www.UFCFighterClassAction.com.

At the Fairness Hearing, the Court will consider whether the Settlement is fair, adequate, and reasonable and should be approved. The Court will also decide whether it should give its final approval of the Plaintiffs' requests for attorneys' fees and expenses, service awards to the Class Representatives, and other costs. The Court will consider any objections and listen to Class Members who have asked to speak at the Fairness Hearing.

19. Do I have to come to the Fairness Hearing to get my money?

No. You do not have to go to the Fairness Hearing, even if you sent the Court an objection. But you can go to the hearing or hire a lawyer to go the Fairness Hearing if you want to, at your own expense.

20. What if I want to speak at the Fairness Hearing?

You must file a Notice of Intention to Appear with the Court at this address:

United States District Court for the District of Nevada
Clerk of the Court
333 Las Vegas Blvd South
Las Vegas, NV 89101

Your Notice of Intention to Appear must be filed by [DATE]. You must also mail a copy of your letter to Class Counsel (specifically, to the lawyers at the addresses listed in Question 14) and Counsel for the Defendant listed below:

Questions? Call 1-866-955-5564 Toll-Free or Visit www.UFCFighterClassAction.com

William A. Isaacson
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
2001 K Street, NW
Washington, DC 20006-1047

Your Notice of Intention to Appear must be signed and: (i) state your name, address, and phone number, and if applicable, the name, address, and telephone number of you attorney (who must file a Notice of Appearance with the Court); and (ii) state that you (or if applicable, your lawyer) intends to appear at the Fairness Hearing for the Settlement in *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*, Case No. 2:15-cv-01045.

IF YOU DO NOTHING

21. What happens if I do nothing at all?

If you are a Class Member and you do nothing, you will remain a member of the Class and be represented by Class Counsel. However, if you do not timely file a Claim Form at the appropriate time later in the process, you will not receive any payment from the Settlement. You will be bound by past and future rulings, including rulings on the Settlement, Released Claims, and Releasees.

GETTING MORE INFORMATION

22. How do I get more information?

This notice summarizes the Action, the terms of the Settlement, and your rights and options in connection with the Settlement. More details are in the Settlement Agreement, which is available for your review at www.UFCFighterClassAction.com. The website also has the complaints and other documents relating to the Settlement.

If you have additional questions, you may contact the Claims Administrator by email, phone, or mail:

- Email: info@UFCFighterClassAction.com.
- Toll-Free: **1-866-955-5564**
- Mail: UFC Fighter Class Action, c/o Administrator, 1650 Arch St, Ste 2210, Philadelphia, PA 19103

Publicly-filed documents can also be obtained by visiting the office of the Clerk of the United States District Court for the District of Nevada or reviewing the Court's online docket.

PLEASE DO NOT WRITE OR CALL THE COURT OR THE CLERK'S OFFICE FOR MORE INFORMATION.

EXHIBIT B

To: [Class Member email address]
From: Class Action Administrator
Subject: Notice of Proposed Class Action Settlement – *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*

Notice ID: <<Notice ID>>

Notice of Class Action Settlement

A settlement totaling \$375 million that will provide payments to mixed martial arts (“MMA”) fighters if they competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017.

A federal court directed this notice. This is not junk mail, an advertisement, or a solicitation from a lawyer.

This notice is only a summary.
Please visit www.UFCFighterClassAction.com for more information

- On [DATE], the Honorable Richard F. Boulware, II of the United States District Court for the District of Nevada (the “Court”), entered an order preliminarily approving a proposed settlement (the “Settlement”) between the parties in the class action captioned *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*, Case No. 2:15-cv-01045 (D. Nev.) (the “Action”).
- The Settlement is for the benefit of MMA fighters who are members of the Class that the Court certified on August 9, 2023 (defined below).
- As part of the Settlement, the Defendant has agreed to make settlement payments totaling \$375 million for the benefit of the Class Members who submit valid and timely Claim Forms later in the process (see below on how to ask for money from the Settlement).
- The Action alleges that the Defendant (or “UFC”) used an anticompetitive scheme to establish and maintain UFC’s market dominance, allowing UFC to pay its fighters substantially less than it would have paid in a more competitive market in violation of federal antitrust law. The Defendant denies these claims and any allegation of wrongdoing and asserts that there is ample competition in the market for MMA fighters, UFC’s conduct was procompetitive, and UFC continually and substantially increased fighter pay over the Class Period. The Honorable Richard F. Boulware, II

of the United States District Court for the District of Nevada is overseeing the Action. Judge Boulware has not decided which side is correct.

What is the purpose of this notice?

You have received this notice because records show you may have competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States during the Class Period, which is defined below, and you are entitled to know about your rights under a proposed Settlement between the parties.

You may be eligible to participate in the Settlement if you are a member of the Class certified by the Court on August 9, 2023. The Class is defined as all persons who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017 (the “Class Period”). The Class excludes all persons who are not residents or citizens of the United States unless the UFC paid such persons for competing in a bout fought in the United States.

What does the Settlement provide?

The Defendant has agreed to pay \$375 million in cash to be paid in three installments consisting of \$125 million after the Court preliminarily approves the settlement, \$125 million after the Court grants final approval of the Settlement, and \$125 million no later than June 30, 2025. Every Class Member who files a valid and timely Claim Form (*see* next topic below) during a process that will occur later will be paid from the monies Defendant paid to settle the Action, less any fees, expenses or other deductions approved by the Court, plus any accrued interest (the “*Le v. Zuffa* Settlement Fund”). The money in the *Le v. Zuffa* Settlement Fund will be also used to pay:

- Money awards for the Class Representatives for their service on behalf of the Class, as approved by the Court;
- The cost of settlement and claims administration and notice, and applicable taxes on the *Le v. Zuffa* Settlement Fund, and any other related tax expenses, as approved by the Court;
- Money for Nathan Quarry to settle his individual Identity Rights Claim and for his service on behalf of the Class; and,
- Attorneys’ fees and reimbursement of expenses for Class Counsel, as approved by the Court.

Payments for claims will vary depending on several factors, including, but not limited to: (i) a fighter’s *pro rata* share of earnings from participating in UFC bouts fought during the Class Period; and (ii) the total number of UFC bouts fought during the Class Period. A minimum or flat payment amount of \$15,000 will also apply. As a general guideline, it is anticipated that using the procedures set forth in the Plan of Allocation, which is the document that describes how the funds from the Settlement will be distributed to Class Members, each Class Member who submits a valid and timely Claim Form may receive between 40% and 80% of the total amount he or she earned from the UFC for participating in bouts during the Class Period. This is only an estimate and not a guarantee on the amount any Class Member may receive. For more information about the payment of claims and the proposed Plan of Allocation, please visit

www.UFCFighterClassAction.com or contact the Claims Administrator using the information at the end of this summary notice.

How do I ask for money from the Settlement?

If you are a Class Member, you must submit a valid and timely claim to get money from the *Le v. Zuffa* Settlement Fund during a process that will begin several months from now. If the Court finally approves the Settlement, as part of the Court approved distribution and allocation process, the Claims Administrator will distribute a Claim Form to complete to all Class Members for which there are valid email or postal addresses. A Claim Form is a document the Claims Administrator will make available to Class Members that contains the information needed to determine what distribution amount each Class Member will receive as part of the proposed Plan of Allocation. Class Members may also contact the Claims Administrator or visit the Settlement Website if they do not receive a Claim Form. The Claim Form will include the deadline for timely submission and instructions on how to submit the Claim Form. Those Class Members who submit Claim Forms are called Claimants. The Court will approve the plan of allocating the Net *Le v. Zuffa* Settlement Fund amongst the Claimants, and will set the schedule for that process, at the time that it decides whether or not to approve the Settlement.

Visit www.UFCFighterClassAction.com for more information on how to submit a Claim Form.

What are my other options?

If you **Do Nothing**, you will be legally bound by the terms of the Settlement, and you will release your claims against the Releasees. The Release and related definitions are set forth in the Settlement Agreement, which is available on the Settlement website. You may **Object** to the terms of the Settlement by **[DATE]**. Please visit www.UFCFighterClassAction.com for more information on how to Object to the Settlement.

Do I have a lawyer in this case?

Yes. The Court appointed the following law firms as Co-Lead Class Counsel to represent you and other Class Members: Berger Montague PC, Cohen Milstein Sellers & Toll, PLLC, and Joseph Saveri Law Firm, LLP. Co-Lead Class Counsel, along with additional firms that assisted them in litigating the Actions, are called “Class Counsel.” Class Counsel will be paid from the *Le v. Zuffa* Settlement Fund upon making an application to the Court.

The Court’s Fairness Hearing.

There will be a Fairness Hearing at **[TIME]** on **[DATE]**. The hearing will take place at the United States District Court for the District of Nevada, Courtroom 7C, 333 Las Vegas Boulevard South, Las Vegas, NV 89101.

Important! The time and date of the Fairness Hearing may change without additional mailed or published notice. For updated information on the hearing, visit www.UFCFighterClassAction.com.

At the Fairness Hearing, the Court will consider whether the Settlement is fair, adequate, and reasonable and should be approved. The Court will also decide whether it should give its final approval of Class Counsel’s requests for attorneys’ fees and expenses, service awards to the Class Representatives, and other costs. The Court will consider any objections and listen to Class Members who have asked to speak at the Fairness Hearing.

This notice is only a summary.

For additional information, visit www.UFCFighterClassAction.com or call toll-free **1-866-955-5564**. You may also write to the Class Action Administrator by mail: **UFC Fighter Class Action**, c/o Class Action Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103, or email: info@UFCFighterClassAction.com.

Unsubscribe

EXHIBIT C

Notice of Class Action Settlement for UFC Fighters

A settlement totaling \$375 million that will provide payments to mixed martial arts (“MMA”) fighters if they competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017.

A federal court directed this notice. This is not junk mail, an advertisement, or a solicitation from a lawyer.

What is the purpose of this notice?

This notice is authorized by the Court to inform all persons who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017 that they may be eligible to participate in a proposed settlement (the “Settlement”) between the parties in the class action captioned *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*, Case No. 2:15-cv-01045 (D. Nev.) (the “Action”).

The Settlement is for the benefit of MMA fighters who are members of the class certified by the Court on August 9, 2023 (defined below). Members of the Class have the right to file an objection if they do not agree with any part of the Settlement, the requested attorneys’ fees and expenses, and/or the requested service awards for the Class Representatives.

What is the lawsuit about?

Plaintiffs in the Action claim that Defendant (or “UFC”) used an anticompetitive scheme to establish and maintain UFC’s market dominance, allowing UFC to pay its fighters substantially less than it would have paid in a more competitive market in violation of federal antitrust law. Defendant denies these claims and any allegation of wrongdoing and asserts that there is ample competition in the market for MMA fighters, UFC’s conduct was procompetitive, and UFC continually and substantially increased fighter pay over the Class Period. The Honorable Richard F. Boulware, II of the United States District Court for the District of Nevada is overseeing the Action. Judge Boulware has not decided which side is correct.

Who is in the Class?

A Class Member is a person who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017 (the “Class Period”). Excluded from the Class are all persons who are not residents or citizens of the United States, unless the UFC paid such persons for competing in a bout fought in the United States during the Class Period.

What does the Settlement provide?

Defendant has agreed to pay \$375 million in cash. Every Class Member who files a valid and timely claim during a process that will occur later will be paid from the monies from the *Le v. Zuffa* Settlement Fund (after deducting costs, taxes, attorneys’ fees and expenses approved by the Court, and any service awards to the representatives Plaintiffs approved by the Court). More information about the Settlement can be obtained by visiting www.UFCFighterClassAction.com.

Who represents the Class?

The Court has appointed the following law firms as Co-Lead Class Counsel to represent you and other Class Members: Berger Montague PC, Cohen Milstein Sellers & Toll, PLLC, and Joseph Saveri Law Firm, LLP. Co-Lead Class Counsel, along with additional firms that assisted them in litigating the Action, are called “Class Counsel.” Class Counsel has been prosecuting the Action, *i.e.*, performing and overseeing work to advance the litigation on behalf of the Plaintiffs and the Class, since December 2014.

You do not need to hire your own lawyer because Class Counsel is working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer’s services.

What are the rights of Class Members?

If you **Do Nothing**, you will be legally bound by the terms of the Settlement, and you will release your claims against the Releasees. You may **Object** to the terms of Settlement by [DATE]. Please visit www.UFCFighterClassAction.com for more information on how to Object the Settlement.

What’s next?

There will be a Fairness Hearing at [TIME] on [DATE]. The hearing will take place at the United States District Court for the District of Nevada, Courtroom 7C, 333 Las Vegas Boulevard South, Las Vegas, NV 89101.

Important! The time and date of the Fairness Hearing may change without additional mailed or published notice. For updated information on the hearing, visit www.UFCFighterClassAction.com.

This notice is only a summary.

For additional information, visit www.UFCFighterClassAction.com or call toll-free **1-866-955-5564**. You may also write to the Class Action Administrator by mail: **UFC Fighter Class Action**, c/o Class Action Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103, or email: info@UFCFighterClassAction.com.



1650 Arch Street, Suite 2210
Philadelphia, PA 19103
www.angeiongroup.com
215.563.4116 (P)
215.525.0209 (F)

Month Day, 2024

RE: *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*,
U.S. District Court of Nevada, Case No. 2:15-cv-01045-RFB-BNW

Dear Gym Owner/Manager:

Enclosed is a legal Poster Notice regarding the above-referenced class action concerning UFC Fighters who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017.

Angeion is the Court-appointed Claims Administrator in this matter, and pursuant to the Court's [DATE OF PRELIMINARY APPROVAL] Order Granting Motion for Preliminary Approval of Settlement, we are sending the enclosed Poster Notice and requesting that it be posted in a highly visible area where Bout Class Members are most likely to view the notice. If you would like to review the Court's Order, please visit the Important Documents page of the notice website at www.UFCFighterClassAction.com.

For additional information, call toll-free 1-866-955-5564. You may also write to the Claims Administrator by mail: UFC Fighter Class Action, c/o Claims Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103, or email: info@UFCFighterClassAction.com.

Sincerely,

Angeion Group, LLC

UFC Fighter Class Action
c/o Claims Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
1-866-955-5564
info@UFCFighterClassAction.com
www.UFCFighterClassAction.com